

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

GARRY DEAN TAYLOR,

Plaintiff,

v.

Civil Action No.:

MEAGAN MARIAH WATSON,
AN INDIVIDUAL, AND WESTERN
EXPRESS, INC., A DOMESTIC FOR-
PROFIT CORPORATION,

Defendants.

NOTICE OF REMOVAL

TO: PLAINTIFF'S COUNSEL

Emily Christine Williams, Esq.
Douglas Law Firm
117 N. Second Street
Palatka, Florida 32177
(800) 705-5457
ewilliams@dhclawyers.com

PLEASE TAKE NOTICE that the Defendants, Meagan Mariah Watson and Western Express, Inc., by and through their undersigned counsel of record, pursuant to U.S.C. §§ 1441 and 1332, and hereby file their Notice of Removal of this action from the Superior Court for the County of Catoosa, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia,

Rome Division.

In support of this Notice of Removal, the Defendants have filed contemporaneously herewith their Brief in Support of Removal and accompanying Exhibits, including the pleadings and entire record of this matter.

WHEREFORE, the Defendants respectfully request that this Court enter an Order removing this action from the Superior Court for the County of Catoosa, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Rome Division.

This the 31st day of August, 2022.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

Kevin T. Shires, Esq.

Georgia Bar No.: 643290

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing document upon all parties to this matter by:

 x Electronically filing this document with CM/ECF which sends notice via that system to all parties and counsel pursuant to O.C.G.A. § 9-11-5(F) and/or U.S.C.R. 36.16(E)

 x Electronically serving this document via email pursuant to O.C.G.A. § 9-11-5 (F) and/or U.S.C.R. 36.16(E) as follows:

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117 N. Second Street
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This 31st day of August, 2022.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

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